



CHALOS & Co. P.C.

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July 6, 2015

Via ECF

Honorable John G. Koeltl
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007-1312

Re: d'Amico Dry Limited v. Primera Maritime (Hellas) Limited, et al.
S.D.N.Y. Docket No.: 09-CV-7840 (JGK)
CHALOS & Co ref: 2191.006

Dear Judge Koeltl:

We are counsel for Defendants Adalia Marine Co. Ltd. (hereinafter "Adalia"), Annamar Navigation Inc. (hereinafter "Annamar"), Caldera Marine Co. Ltd. (hereinafter "Caldera"), Chemnav Inc. (hereinafter "Chemnav"), Chemnav Shipmanagement Ltd. (hereinafter "Chemnav Shipmanagement"), Seasafe Navigation Inc. (hereinafter "Seasafe"), and Seasatin Navigation Inc. (hereinafter "Seasatin") in the above-captioned matter and take the laboring oar on writing on behalf of all alleged alter-ego Defendants. On May 20, 2015, the parties appeared at a conference before this Honorable Court on Defendants' request for permission to file a motion for judgment on the pleadings.

At the conference, counsel discussed the proposed motion with the Court and also sought a stay of the discovery on the plaintiff's alter-ego allegations pending the resolution of merits of Defendants' motion. The Joint Motion for Judgment on the Pleadings (Dkt. #185) remains *sub-judice*. As part of the post-conference Order (Dkt. #184) the Court stayed discovery on the issue of alter-ego through July 6, 2015; so that the Court could consider the arguments raised by the motion and to give the Court "some opportunity to decide the motions, if there are motions." See Dkt. #191-4, Conference Tr. p. 44, ln. 2-4. Although the initial stay is set to expire today, no decision on the motion has been issued. As such, Defendants respectfully request that the Court extend the stay of discovery on the issue of alter-ego, pending a ruling on Defendants' Joint Motion for Judgment on the Pleadings.

We thank the Court for its attention to this matter.



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Respectfully yours,

CHALOS & Co, P.C.

A handwritten signature in black ink, appearing to read 'G. Chalos'.

George M. Chalos
Briton P. Sparkman

Enc.

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